

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

-----X	:	
JASON WILLIAMS,	:	
	:	
Plaintiff,	:	
	:	Case No.: 5:19-cv-00475-BO
vs.	:	
	:	
AT&T MOBILITY, LLC,	:	
	:	
Defendant.	:	
-----X	:	

**PLAINTIFF’S NOTICE OF MOTION  
TO COMPEL DEFENDANT AT&T MOBILITY LLC TO PRODUCE DOCUMENTS**

Plaintiff Jason Williams, by and through his undersigned counsel, respectfully moves this Court for an Order to compel Defendant AT&T Mobility LLC (“AT&T” or “Defendant”) to produce documents in response to its First Set of Request for Production of Documents, dated June 5, 2020, pursuant to Federal Rules of Civil Procedure 26 and 34 and the Local Rules of the Eastern District of North Carolina 26.1 and 34.1.


In further support of this Motion, Plaintiff submits the accompanying memorandum of law and the declaration of Christopher N. LaVigne, executed on February 12, 2021, and the exhibits annexed thereto.

WHEREFORE, Plaintiff respectfully requests this Court to enter an order requiring Defendant AT&T Mobility LLC to produce all documents, including specifically email communications, responsive to Request Nos. 1, 2, 3, 7, and 8 of Plaintiff’s First Set of Requests for Production of Documents, and requiring Defendant to pay Plaintiff’s reasonable expenses incurred in making the Motion to Compel, including attorney’s fees in the amount of \$25,086.00.

Dated: February 12, 2021

Respectfully Submitted,

**WITHERS BERGMAN LLP**

By:   
\_\_\_\_\_  
Christopher N. LaVigne, Esq.  
Joseph Gallo, Esq.  
430 Park Avenue  
New York, New York 10022  
(212) 848-9800  
Christopher.LaVigne@withersworldwide.com  
Joseph.Gallo@withersworldwide.com

*Attorneys for Plaintiff Jason Williams*